



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

February 23, 2016

Eric Pastor
PRP Group Project Coordinator
Pastor, Behling, & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

RE: EPA Approval of the Final RI/FS Work Plan, Field Sampling Plan, Quality Assurance Project Plan, and Revised Schedule; EPA Concurrence of Site Health and Safety Plan; Area of Investigation I (AOI-1), USOR Superfund Site, 400 N. Richey Street, Pasadena, Texas

Dear Mr. Pastor

Pursuant to Paragraphs 21 through 27, and Paragraph 29 of Appendix B (Statement of Work) to the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, the EPA received the following final documents dated December 23, 2015 (Plans) via email from Pastor, Behling & Wheeler, LLC (PBW), on behalf of the Respondents named in the Settlement Agreement, for approval:

- Remedial Investigation/Feasibility Study (RI/FS) Work Plan;
- RI/FS Field Sampling Plan (FSP);
- RI/FS Quality Assurance Project Plan (QAPP); and
- RI/FS Site Health and Safety Plan (HASP).

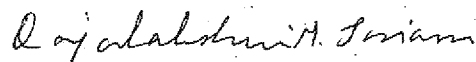
EPA had reviewed the Plans and had agreed that all the review comments sent earlier on September 30, 2015 have been addressed adequately in the Plans. EPA however, did not agree with the schedule that was submitted in the December 23, 2015 RI/FS Work Plan which was different from the schedule submitted earlier.

On January 20, 2016, attorneys and technical staff on behalf of the Respondents met with EPA Superfund Management and staff to discuss the proposed change in schedule. After carefully considering the factors and arguments for the newly proposed schedule, the EPA decided to hold off on approving/concurring with these Plans until a mutually agreeable schedule was worked out. A revised schedule was submitted to the EPA on February 12, 2016 which was not acceptable to the EPA. Since then, a mutually agreeable revised schedule has been worked out and was submitted to the EPA on February 23, 2016. This revised schedule, submitted as an addendum to the December 23, 2015 RI/FS Work Plan, supersedes the schedules submitted earlier on December 23, 2015 and on February 12, 2016.

EPA approves the December 23, 2015 RI/FS Work Plan, FSP, QAPP as submitted along with the revised schedule addendum submitted on February 23, 2016. EPA also concurs with the December 23, 2015 HASP as submitted.

If you have any questions or would like to discuss please contact me at (214) 665-8529.

Sincerely,



Raji Josiam
Remedial Project Manager (6SF-RA)
Superfund Division

Electronic Copy:

Kenneth Shewmake – EPA R6

Anna Milburn – EPA R6

Carlos Sanchez - EPA R6

Lam Tran – TCEQ

Michael Cave – TCEQ (LAT)

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Patrick Gobb – Bayer Crop Science